



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

RCH/PP
F. #2019R00927

271 Cadman Plaza East
Brooklyn, New York 11201

August 9, 2021

By ECF

The Honorable Brian M. Cogan
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Ivan Reyes Arzate
Criminal Docket No. 20-030 (BMC)

Dear Judge Cogan:

A status conference in this case is currently scheduled for August 18, 2021. The parties respectfully request that the Court adjourn the upcoming status conference and schedule an in-person change of plea hearing in approximately 60 days. The parties have currently reached an agreement in principle to resolve this matter but still need additional time to finalize the written plea agreement. The additional time to finalize the plea agreement is also requested because defense counsel is scheduled to begin a murder trial in the Southern District in New York in mid-September. Accordingly, the parties respectfully request that the Court adjourn the status conference scheduled for August 18, 2021 and schedule a change of plea hearing in approximately 60 days. The parties agree that an order of excludable delay is appropriate here based on the Court's previous complex case designation in this matter and the party's ongoing plea negotiations.

Respectfully submitted,

JACQUELYN M. KASULIS
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By: _____

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cc: Mark DeMarco, Esq. (by ECF)
Clerk of the Court (BMC) (by ECF)